

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHANITHA WILLIAMS, et al.,)	
)	
)	No. 07 C 6615
Plaintiffs,)	
)	
vs.)	Judge Hibbler
)	Magistrate Judge Valdez
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO
FILE A FIRST AMENDED COMPLAINT**

Plaintiffs, through counsel, Law Offices of Lawrence V. Jackowiak, respectfully requests that this Honorable Court enter an order granting them to June 13, 2008, to file their amended complaint. In support thereof, Plaintiff states as follows:

1. The present Complaint involves an incident that occurred on October 31, 2006.
2. At the time of the filing of the initial Complaint, Plaintiffs did not know the names of the Defendant-Officers.
3. On April 22, 2008, this Honorable Court gave Plaintiffs until May 22, 2008, to file an amended complaint.
4. Through discovery, Plaintiff's counsel has received seven audio CDs of 911 and radio dispatch calls regarding the underlying incident, and 263 pages of attendance and assignment sheets, OPS files, and supplemental reports.
5. Plaintiff has devoted substantial time to listening to the CDs and reviewing the documents trying to identify the unknown Defendants-Officers. Plaintiff has been able to identify a few officers, but not all.
6. Since April 22, 2008, Plaintiffs' counsel has had several other matters that have demanded substantial time, including the following:
 - Jury Trial from May 13-16, 2008, in the case Reese v. City of Chicago, et al., No. 07 C 2567, before Judge Moran;
 - On May 6, 2008, Plaintiff's counsel filed a response to a motion for summary judgment in the case Avila v. Cook County, et al., No. 06 C 2947; and

- On May 9, 2008, Plaintiff's counsel filed a response to a motion for summary judgment in the case Cross v. City of Chicago, et al., No. 07 C 2472.

7. Plaintiff anticipates taking the deposition of a supervisor who was present for the incident in an attempt help identify the other officers.

8. Additionally, the parties have started settlement negotiations and may be able to settle the case prior to June 13, 2008.

9. This motion is not brought for purposes of delay and will not cause prejudice.

WHEREFORE Plaintiffs respectfully request that this Honorable Court enter an order allowing Plaintiff until June 13, 2008, to file a First Amended Complaint adding Defendant-Officers.

Respectfully submitted,

/s/ Louis J. Meyer
Counsel for the Plaintiff

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